

State of Montana

**Commissioner of Securities and Insurance
at the State Auditor's Office**



**Agency IT Plan
Fiscal Years 2012-2017**

May 2012

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EXECUTIVE SUMMARY

The Montana Commissioner of Securities and Insurance (CSI), also known as the State Auditor, is the chief regulator of Montana's insurance and securities industries. The Commissioner's office is a law enforcement agency charged with protecting Montanans from fraud and abuse in investments and insurance.

The CSI Information Technology Department (IT) is responsible for development, maintenance, central coordination, and support of technology services for the CSI. The department provides systems and user administration, applications development, and support services to the agency, contractors, consultants and Federal entities. IT is responsible for the planning, development, implementation and maintenance of comprehensive local, and state-wide IT solutions to better provide services to the agency's employees, partners, vendors and the public. Responsibilities include technical short term and long range planning, management reporting, budgetary planning, resource allocation, and development of policies and procedures.

The IT Department is responsible for providing office automation services for the entire agency. IT provides support in end-user computing, office automation products, microcomputer support, computer-related training, research and evaluation of end user office automation products, and publication and maintenance of Microcomputer User Guides. The Department also provides for the development, configuration, implementation, operation and ongoing support of all communications networks utilized within the agency. The CSI relies heavily on a stable and accessible technology infrastructure.

The CSI IT Department is poised to begin a long overdue update of the agency's internal database applications, imaging software, and server environment. CSI will phase out its unsupported central database system in two blocks, beginning with the implementation of insurance regulation software known as State Based Systems (SBS). SBS is a subsidiary of the National Association of Insurance Commissioners (NAIC) and is a popular no-cost product used by many states' insurance regulators.

The second block will address the remainder of CSI services that SBS can't accommodate, including insurance regulation, investigations, tax revenue, surplus lines regulation, and more. The CSI will begin this block with a needs assessment to determine the essential features and functions of a custom replacement. The CSI will then pursue a custom-programmed solution to replace the outdated application currently in use.

CSI also plans to replace its outdated scanning application with an electronic documents management system. This will further the agency's goal of improving efficiency and cutting waste by building a paperless office.

SECTION 1: AGENCY ADMINISTRATIVE INFORMATION

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IT Inventory

The IT inventory database located at <http://mine.mt.gov/enterpriseitinventory> has already been updated. As required by MCA 2-17-524(3)(c) the plan will be updated by June 30th, 2012.

SECTION 2: AGENCY IT MISSION

The office of the State Auditor is authorized under Article VI of the Montana Constitution. The State Auditor is the Commissioner of Securities and Insurance and is responsible for regulating the insurance and securities industries in the state. The Commissioner adopts rules and enforces insurance and securities laws in Montana. The CSI protects Montana consumers by investigating complaints and, if necessary, taking legal action to prevent fraud and abuse in insurance and securities.

CSI IT Staff actively pursues innovative solutions to the agency's technology needs, developing custom interfaces, providing stable infrastructure, and leveraging emerging technologies to advance the business objectives of the CSI and the State of Montana.

SECTION 3: AGENCY REQUIRED PROGRAMS

Information Security Management (ISM) Program General Description

The Commissioner of Securities and Insurance has a basic agency information security management program that complies with §2-15-114, MCA and ITSD Information Security Programs policy with adoption of the National Institute of Standards and Technology (NIST) Special Publication 800 series as a guide. This basic program attempts to align with ITSD's direction for an enterprise approach to protect sensitive and critical information being housed and shared on state and/or external information assets or systems.

Future Security Program Plans

CSI's information security management program is challenged with limited resources, staff time and funding. While IT staff continues to review alternatives and implement mitigation efforts, the level of acceptable risk is constantly challenged by the ever changing technology and associated risks from growing attacks. IT staff has identified specific vulnerabilities that require restructure or new equipment.

As described in NIST SP 800-39, the agency will develop and adopt the Information Risk Management Strategy to guide the agency through the information security lifecycle architecture. This structure provides a programmatic approach to reducing the level of risk to an acceptable level, while ensuring legal and regulatory mandates are met in accordance with MCA §2-15-114.

The agency's program will include the four components proposed by NIST, which interact with each other in a continuous improvement cycle. The four components are as follows:

- Risk Frame – Establishes the context for making risk-based decisions
- Risk Assessment – Addresses how the agency will assess risk within the context of the risk frame, identifying threats, harm, impact, vulnerabilities and likelihood of occurrence
- Risk Response – Addresses how the agency responds to risk once the level of risk is determined based on the results of the risk assessment; e.g., avoid, mitigate, accept risk, share or transfer
- Risk Monitoring – Addresses how the agency monitors risk over time

By applying the NIST framework in developing its technical security program, the CSI will reduce the risks that the agency is exposed to through the use of IT systems. The objectives of this program are to:

- conduct periodic assessments of risks;
- develop and publish policies and procedures that are based on risk assessments;
- conduct security awareness training;
- conduct periodic testing and evaluation of the effectiveness of information security policies, procedures, practices, and security controls;
- develop a process for planning, implementing, evaluating, and documenting remedial actions;
- develop procedures for detecting, reporting, and responding to security incidents; and
- develop plans and procedures for continuity of operations.

Continuity of Operations (COOP) Capability Program General Description

In April, 2012, the CSI joined with the Montana Department of Administration's Security and Continuity Services (SCS) for the redevelopment of the agency's continuity of operations capabilities. SCS will provide the plans and structure for response and recovery capabilities at the CSI, ensuring the continued performance of the essential functions of the CSI.

CSI was an early participant in the COOP program and the use of Living Disaster Recovery Planning System (LDRPS) software, but since that initial involvement, the approach that SCS uses to help agencies has changed drastically. The CSI has made updating its COOP plan a high priority in the agency's IT plan.

Updating the COOP plan involves two blocks of focus: completing the Business Continuity Plans (BCP) in two phases and working on specific activity plans, including Emergency Action Plans (EAP), Information System

Contingency Plans (ISCP), Communications Plans, Incident Management Plans, and more. The CSI recently started the first of two BCP phases and expects full completion of both blocks by the end of 2012.

Information identified and recorded under the COOP structure can tie into the Records Management Program and fulfill Information Security Management Program requirements. Integration of these three programs is critical to the confidentiality, integrity, and availability of information associated with each program.

Future COOP Program Plans

CSI IT staff will facilitate and coordinate the Continuity of Operations (COOP) planning for the agency. Production and development instances of the Living Disaster Recovery Planning Software (LDRPS) are housed in ITSD's Enterprise Data Center. SCS staff is completing the configuration of the software, establishing links to other data sources such as SABHRS, and defining planner "navigators" for agency staff to enter agency-specific data into LDRPS.

SCS navigators will simplify data entry and ensure an appropriate level of security for the data being recorded in LDRPS. SCS staff is defining appropriate training levels necessary for individuals involved in COOP planning and coordinating the acquisition and delivery of the necessary training. SCS staff will provide general direction and one-on-one assistance for the completion of COOP planning in LDRPS. They will also facilitate exercises/drills of the agency COOP plans. The on-going process for COOP planning will be data entry into LDRPS with plan publication; agency management's review and approval of the plan; and exercises and drills with the plan. This process will be scheduled annually to ensure the State's COOP plans are maintained and in compliance with federal regulations.

SECTION 4: AGENCY IT PLAN – GOALS & OBJECTIVES

Goal Number 1: Implementation of SBS Software and Legacy System Replacement

ITG 1

Description:

The Commissioner of Securities and Insurance (CSI) performs many of its regulatory and consumer protection functions, including insurance producer licensing, company licensing, premium tax collection, consumer complaint management, and investigations on a central application system called SAOProd. SAOProd was custom built 17 years ago in a version of Oracle that is no longer supported by the publisher.

Currently, only one member of the CSI IT team has enough experience and training with the outdated version of Oracle to modify and manipulate SAOProd. Training courses for Oracle are offered in the current version of Oracle, which is not useful to staff in working with SAOProd. Should the agency lose its institutional knowledge, SAOProd would be rendered useless, and a large portion of the office's regulatory and consumer protection functions would face significant IT challenges.

Because the CSI regulates both the insurance and securities industries, no single off-the-shelf product can meet all of the CSI's data management needs. Instead, the CSI will begin phasing out SAOProd in discrete steps to improve agency efficiency without creating gaps in IT functionality or service. In Block 1, the CSI has identified an alternative application system that will not only replace, but exceed the efficiency, functionality, and constituent service provided through the CSI's Insurance Department.

State Based Systems (SBS) is rapidly becoming the uniform, national standard for data management of state-based insurance regulation. A web-based application developed through the National Association of Insurance Commissioners (NAIC), SBS will give CSI staff direct integration with national insurance databases and reduce strain on existing CSI IT infrastructure. SBS will replace most Insurance Department operations currently run under the aging legacy application system, SAOProd.

CSI operations that cannot be incorporated into SBS include securities regulation, securities investigations, central accounting, and legal case management. These operations will be addressed concurrently in Block 2 of the SAOProd replacement plan.

Benefits:

SBS software represents a cooperative effort with all other state insurance regulatory agencies. The insurance industry in Montana benefits as data collection and interpretation become standardized across state lines.

Because SBS software is web-based, less strain will be placed on CSI servers and other hardware to support the agency's insurance regulation functions. CSI staff will also have direct access to the NAIC's national insurance databases through SBS -- a vital feature that SAOProd cannot match.

Strategic Goals Addressed:

Moving from SAOProd to SBS allows the CSI to achieve maximum value of information through the active management of information technology

Supporting Objective/Action

ITO 1-1 Maximize the advantages for installing SBS software for Montana CSI, the state's insurance regulator.

Describe the business requirements or business problem driving this objective.

CSI's in-house database "SAOProd" has proven difficult to develop and maintain internally. SBS software provides a web-hosted alternative that allows the Montana insurance regulators to use a standardized data

solution while maintaining data requirements specific to Montana.

Describe the benefits to be derived from the successful completion of this objective.

Montana will share in a national data effort that will benefit CSI, insurance producers, consumers and other state insurance regulators.

Describe the anticipated risks associated with this objective. (e.g., risks associated with inaction or not completing this objective; risks associated with completing this objective).

While SBS is a proven software product utilized by many other states, the CSI will lose some of the flexibility related to custom internal programming solutions. The biggest challenge will be overcoming the risks involved with regulatory staff adapting to a new software product. Because the CSI will need to rely on SBS staff to provide setup, training and support, the agency's successful completion of the project within the scheduled timeframe depends largely on SBS staff.

What is the timeframe for completion of this objective?

The CSI plans on finishing the SBS conversion within two years.

Describe the critical success factors associated with this objective; i.e., how will you know when it has been successfully completed?

Many of CSI's business processes are related to data reporting to the NAIC. Once the implementation is complete CSI will be conducting a majority of its insurance regulation functions on the SBS system.

Supporting Objective/Action

ITO 1-2 Select data solutions that interface with national databases and improve communication between the public and members of industry

Describe the business requirements or business problem driving this objective.

Although our Oracle database was flexible, restructuring or rebuilding the database to integrate with national databases (when changes were proposed) was difficult. With 25 states already using SBS software, major software updates driven by national regulatory changes will automatically cascade to all states using SBS, eliminating expenses associated with the CSI unilaterally modifying its own unique application.

Describe the benefits to be derived from the successful completion of this objective.

Standardization to a hosted software solution alleviates much of the need for in-house software development and allows CSI IT staff to focus on other areas of improvement.

Describe the anticipated risks associated with this objective. (e.g., risks associated with inaction or not completing this objective; risks associated with completing this objective).

If the data transition process is not properly managed, SAOProd could become unstable, threatening day-to-day functions of the CSI's central database.

What is the timeframe for completion of this objective?

Once the two year implementation is complete, the CSI will have input into the continued development of SBS software. The other members of the NAIC and the insurance industry will no doubt continue to propose changes in the insurance regulation arena and the CSI will be part of the continuing effort to improve SBS software.

Describe the critical success factors associated with this objective; i.e., how will you know when it has been successfully completed?

When SBS is fully operational at the CSI, staff will have fully integrated access to national databases to access valuable information from other states.

Goal Number 2: Establish a Standardized Equipment Replacement Cycle

ITG 2

Description:

Technology use at CSI has increased dramatically over the last decade. IT purchases were once considered occasional large capital acquisitions, and agencies expected to see value from these purchases over a long period of time. Today, technology is more valuable than ever before, but shorter life-cycles have made more frequent hardware replacement a necessity.

At the CSI, there is a critical need to replace aging technology infrastructure more frequently. To mitigate the budgetary impacts, the CSI has used non-standard replacement cycles, using carry-forward funds on a temporary basis for those systems that can fulfill agency objectives with current hardware. Emergency systems continue to be replaced on schedule, but putting all CSI system hardware onto a standard replacement cycle is a top IT priority for the agency.

Benefits:

The CSI's staff and customers will benefit from the increased data availability. Newer releases of software typically provide newer features and improved reliability. Newer hardware usually runs faster, more reliably and has features that benefit both the desktop user and the agency as a whole.

Strategic Goals Addressed:

Build an infrastructure that provides CSI customers and staff access to information however and whenever they need it.

Supporting Objective/Action

ITO 2-1 Evaluate the CSI's equipment needs (servers, peripherals, laptops and desktops) and replace older hardware with newer models

Describe the business requirements or business problem driving this objective.

Aging IT infrastructure at the CSI has fallen out of warranty, leaving essential services vulnerable to hardware failure.

Describe the benefits to be derived from the successful completion of this objective.

CSI staff, our data partners and our customers (insurance industry, securities industry and consumers) will benefit from increased IT stability, less risk of downtime, and more reliable backups in case of emergency. Clearly identified equipment needs will help the CSI implement a standardized equipment cycle efficiently and avoid unnecessary or premature replacement of equipment that still suits the agency's needs.

Describe the anticipated risks associated with this objective. (e.g., risks associated with inaction or not completing this objective; risks associated with completing this objective).

If the CSI implements a standardized equipment replacement cycle without first conducting a needs evaluation, it is possible that equipment which still meets the agency's needs could be prematurely replaced. Performing the evaluation first will prevent unnecessary expenditures and help keep the agency's IT department on budget.

What is the timeframe for completion of this objective?

Formalizing a standard replacement cycle will coincide with legislative approval for base equipment replacement expenses in the CSI budget. In the future, regular evaluation of the CSI's equipment needs will proceed according to the standard replacement cycle policy.

Describe the critical success factors associated with this objective; i.e., how will you know when it has been successfully completed?

The final work product of this objective will be a comprehensive assessment of the CSI's current IT equipment environment. Clearly identified equipment shortcomings or gaps will indicate the starting point for a successful equipment replacement cycle.

Supporting Objective/Action

ITO 2-2 Maintain software licensing standards to keep operating systems, applications and desktop computers secure, up-to-date and in compliance with licensing laws.

Describe the business requirements or business problem driving this objective.

The CSI employs numerous applications that require periodic updates including virus protection, operating systems, Adobe products, Microsoft office products, Novell and Oracle. We also have specialized audio transcription software, specialized insurance market conduct software and various other specialized software products on user's desktops. The makers of these applications routinely release new versions and phase out support of old versions over time. If the CSI does not keep pace with these software updates, the agency's IT environment grows increasingly susceptible to security risks, extended periods of down time and software audits which could result in costly penalties for the agency.

Describe the benefits to be derived from the successful completion of this objective.

Maintaining fully-supported, up-to-date licenses for CSI software is essential to maintaining the security and stability of the agency's internal network and desktop environment. Desktop users will also benefit from enhanced functionality and added features that often accompany new software releases.

Describe the anticipated risks associated with this objective. (e.g., risks associated with inaction or not completing this objective; risks associated with completing this objective).

The CSI already works in an environment where several essential applications are no longer supported by their vendors. For example, the CSI's central database application, SAOProd, is written in a version of Oracle that is no longer supported by the vendor. All technical support must be managed internally, which hinders agency efficiency.

What is the timeframe for completion of this objective?

Formalizing a standard licensing cycle will coincide with legislative approval for base software license expenses in the CSI budget. In the future, regular evaluation of the CSI's software needs will proceed according to the standard replacement cycle policy.

Describe the critical success factors associated with this objective; i.e., how will you know when it has been successfully completed?

Replacing hardware while running outdated software will only marginally improve agency efficiency and productivity. When a standard replacement cycle policy is in place at the CSI, users will benefit from faster technical support, added features, and an improved overall network environment -- all of which translate to better customer service and increased productivity.

Goal Number 3: Implement a Document Management Strategy for CSI

ITG 4

Description:

Every year, the CSI accumulates more than one million pages of policy forms, correspondence, and other documents that must be retained according to state policies. Document imaging and electronic document management are essential to keeping the CSI's records in order and accessible to staff. The CSI will implement an effective electronic documents management system to improve agency efficiency and reduce storage costs and paper use.

Benefits: Well organized, scanned documents will provide quicker access for CSI staff, improving efficiency, productivity and responsiveness to industry and consumer requests.

Strategic Goals Addressed:

Enhance the reliability and security of the state's information systems.

Supporting Objective/Action

ITO 4-1 Replace CSI's outdated scanning software with a comprehensive, up-to-date electronic document management system.

Describe the business requirements or business problem driving this objective.

The system the CSI office has used for the last 15 years, Digi-Doc, no longer meets new state and federal compliance requirements for security, auditing, records retention and storage; nor does it interface with other agency applications. CSI business needs have also changed drastically since Digi-Doc's inception.

Describe the benefits to be derived from the successful completion of this objective.

Replacing Digi-Doc with a modern electronic documents management system will improve agency productivity by giving staff a functional search feature, text recognition, and an improved storage process. In turn, CSI staff will be able to recall stored documents faster and more efficiently, reducing the time required to respond to consumer and industry requests.

Describe the anticipated risks associated with this objective. (e.g., risks associated with inaction or not completing this objective; risks associated with completing this objective).

Digi-Doc is no longer a supported software product. Without Digi-Doc technical support available during the data transition, the replacement software will need to be able to independently incorporate all files created over the last 15 years of Digi-Doc use. Backup and long term migration plans must be in place to prevent the loss of important documents.

What is the timeframe for completion of this objective?

The CSI plans to have a fully functional electronic documents management system in place by the end of 2013.

Describe the critical success factors associated with this objective; i.e., how will you know when it has been successfully completed?

Regulatory staff will benefit from quicker, easier document scanning and electronic document retrieval.

Supporting Objective/Action

ITO 4-2 Install integrated access to the imaged documents at the desktop for our users in a cost effective and timely manner.

Describe the business requirements or business problem driving this objective.

CSI regulatory staff needs to have access to electronically stored documents from their desktops. Installing desktop software and training regulatory staff on its use will be essential to the agency's mission.

Describe the benefits to be derived from the successful completion of this objective.

All CSI employees will have immediate access to the documents that have been scanned into the system and organized for easy retrieval.

Describe the anticipated risks associated with this objective. (e.g., risks associated with inaction or not completing this objective; risks associated with completing this objective).

The CSI staff must have continuous access to electronically stored documents. Gaps in access could hinder agency efficiency and productivity. A backup copy of Digi-Doc will be kept until the new electronic documents management system is fully operational.

What is the timeframe for completion of this objective?

CSI plans to have its records management system running by the end of calendar year 2013.

Describe the critical success factors associated with this objective; i.e., how will you know when it has been successfully completed?

The CSI's objective will be satisfied when the agency has a fully functional electronic documents management system and all CSI users know how to access the files they need.

SECTION 5: IT INITIATIVES (FY2012 – FY 2017)

Initiative 1 **CSI Legacy System Application Replacement (SAOProd)**

Description: This proposal requests funding to replace the CSI's aging and outdated main application system, which is integral to all the business functions of the Securities and Insurance Departments.

The Commissioner of Securities and Insurance (CSI) performs many of its regulatory and consumer protection functions, including insurance producer licensing, company licensing, premium tax collection, consumer complaint management, and investigations on a central application system called SAOProd. SAOProd was custom built 17 years ago in a version of Oracle that is no longer supported by the publisher.

Currently, only one member of the CSI IT team has enough experience and training with the outdated version of Oracle to modify and manipulate SAOProd. Training courses for Oracle are offered in the current version of Oracle, which is not useful to staff in working with SAOProd. Should the agency lose its institutional knowledge, SAOProd would be rendered useless, and a large portion of the office's regulatory and consumer protection functions would face significant IT challenges.

Because the CSI regulates both the insurance and securities industries, no single off-the-shelf product can meet all of the CSI's data management needs. Instead, the CSI will begin phasing out SAOProd in discrete steps to improve agency efficiency without creating gaps in IT functionality or service. In Block 1, the CSI has identified an alternative application system that will not only replace, but exceed the efficiency, functionality, and constituent service provided through the CSI's Insurance Department.

State Based Systems (SBS) is rapidly becoming the uniform, national standard for data management of state-based insurance regulation. A web-based application developed through the National Association of Insurance Commissioners (NAIC), SBS will give CSI staff direct integration with national insurance databases and reduce strain on existing CSI IT infrastructure. SBS will replace most Insurance Department operations currently run under the aging legacy application system, SAOProd.

CSI operations that cannot be incorporated into SBS include securities regulation, securities investigations, central accounting, and legal case management. These operations will be addressed concurrently in Block 2 of the SAOProd replacement plan.

Initiative 2 **Imaging/Electronic Documents Management System**

Description: This proposal requests funding to replace the CSI's internal document imaging system.

The Commissioner of Securities and Insurance (CSI) has a legal requirement to keep copies of most of the documents that come into the office on a regular basis. This currently amounts to approximately 1,080,000 documents each year, which need to be scanned to create a digital image for easier storage and retrieval. The number of documents that need to be scanned continues to rise.

The system the CSI has used for the last 15 years, Digi-Doc, no longer meets state and federal compliance requirements for security, auditing, records retention and storage; and does not interface with other applications. The CSI's business needs have also changed drastically since Digi-Doc was implemented. Each bureau and department has different imaging needs and requirements under state and federal law. Therefore, any enterprise imaging and workflow system must be scalable to accommodate this varied demand.

Digi-Doc does not support the expansion necessary to suit each bureau's specific needs. The CSI will write an RFP and select a replacement system that fulfills the agency's wide spectrum of needs.

Any temporary gaps in agency scanning service that result from the transition away from Digi-DOc should not significantly impede day-to-day agency functions. A long-term disruption of service could create a sizable backlog of unscanned documents, putting strain on already limited agency storage resources. To mitigate the risk of a long-term disruption, Digi-Doc will remain as a backup service until the replacement system is fully operational.

The CSI requests funding to purchase a replacement document imaging solution. The selected solution must integrate with existing CSI hardware, eliminating one-time-only hardware update costs.

Currently, all CSI regulatory personnel are trained in the use of Digi-Doc. Retraining will be required to ensure the transition to the new system is as seamless as possible for the end user.

Initiative 3 Technology Core Replacement Cycle

Description: This proposal establishes a standard equipment replacement cycle at the CSI.

The industries regulated by the CSI increasingly leverage technology to reduce the cost of doing business. As insurance and securities companies pursue paperless solutions for their day-to-day operations, the CSI needs to meet and exceed the technical necessity created by industry advances.

To mitigate the budgetary impacts, the CSI adopted non-standard replacement cycles, using carry-forward funds on a temporary basis for those systems that can fulfill agency objectives with existing hardware. Emergency systems continue to be replaced on schedule.

With shorter technology life-cycles, there is a critical need to expand and replace aging technology infrastructure more frequently. Putting all CSI system hardware onto a standard replacement cycle is a top priority of the agency. To ensure CSI has adequate funding to keep equipment on the state's standard cycle, the recurring replacement cost must be incorporated into the annual agency budget.

This proposal will allow ongoing technology infrastructure replacement for critical systems that have not been previously built into the budget. The base adjustment will allow the IT Department to engage in proactive replacement of technology in accordance with the schedules recommended in Enterprise Policy.

SECTION 6: ENTERPRISE ALIGNMENT

Communities of Interest Participation

☒ Government Services

☐ Public Safety

☐ Human Resources

☐ Environmental

☐ Education

☒ Economic

☐ Cultural Affairs

☒ Finance

SECTION 7: PLANNED AGENCY IT EXPENDITURES

<u>Expense Category</u>	<u>FY2012</u>	<u>FY2013</u>	<u>FY2014</u>	<u>FY2015</u>	<u>FY2016</u>	<u>FY2017</u>
Personnel Services	293,874	293,874	293,874	293,874	293,874	293,874
Operating Expenses	239,575	239,575	239,575	239,575	239,575	239,575
Initiatives						
Other expenditures						
Totals	533,449	533,449	533,449	533,449	533,449	533,449

SECTION 8: ADDITIONAL INFORMATION - OPTIONAL

Other types of information that support the agency's IT Plan. Some examples might include other COI participation, reference to other IT plans such as GIS plan, eGovernment plan, security plan, staffing issues and constraints, etc.